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UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

Douglas S. Stanger, Esquire

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Attorney for Chapter 7 Trustee

In Re:

Anne L. Deeck,

Debtor(s).

CAMDEN VICINAGE

Chapter 7

Case No. 19-12214-JNP

Honorable Jerrold N. Poslusny, Jr.

APPLICATION FOR A CONSENT ORDER EXTENDING THE TIME FOR A TRUSTEE TO FILE A COMPLAINT OBJECTING TO DISCHARGE OF DEBTORS PURSUANT TO § 727 OF THE BANKRUPTCY CODE AND TIME TO MOVE FOR A DISMISSAL OR CONVERSION OF THE CASE PURSUANT TO § 707 TO MAY 15, 2020

THIS MATTER coming before the Court upon the Application of Douglas S. Stanger, Esq., of the law firm Flaster Greenberg, P.C., counsel for Chapter 7 Trustee, Douglas S. Stanger, for entry of a Consent Order upon the consent of the Trustee for the Estate of Anne L. Deeck (the "Debtor"), and John A. Underwood, Esq. on behalf of the Debtor, and the parties having consented to the entry of this Order within the bankruptcy proceeding respectfully represents as follows:

- 1. The Debtor filed a Chapter 13 Petition on February 1, 2019.
- 2. The case was converted to a Chapter 7 on October 17, 2019
- 3. Douglas S. Stanger was appointed as Trustee of the Estate on October 17, 2019.
- 4. The time to object to Debtor's discharge will expire on February 11, 2020.

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5. The Debtors have not yet attended the 341(a) meeting of creditors. The meeting is scheduled for March 27, 2020, which date is beyond the current object to discharge date.

WHEREFORE, Douglas S. Stanger, on behalf of the Chapter 7 Trustee, respectfully requests that this Honorable Court enter the proposed form of Consent Order granting the relief set forth and additional relief as may be appropriate.

FLASTER/GREENBERG, P.C.

/s/Douglas S. Stanger

Douglas S. Stanger, Esq.

Dated: January 29, 2020